

In The Matter Of:

*Stacy L. Randall v
Reed C. Widen, et al.*

*Stacy L. Randall
August 28, 2023
Confidential*

*Colleen Reed Reporting LLC
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22	(Original transcript supplied to Attorney Christa D. Wittenberg)	
23	(Originals of Exhibits <u>1</u> through <u>31</u> are attached to the original transcript. Scanned copies were provided to all counsel)	
24		
25		

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<p>1 speculation.</p> <p>2 THE WITNESS: I did not know about it</p> <p>3 prior.</p> <p>4 (Exhibit No. <u>21</u> was marked.)</p> <p>5 BY MR. CHURCHILL:</p> <p>6 Q The court reporter has now handed you what's</p> <p>7 been marked for identification as Exhibit <u>21</u> to</p> <p>8 your deposition, Ms. Randall.</p> <p>9 A Yes.</p> <p>10 Q It is a two-page document labeled Windy47391 to</p> <p>11 47392, and it is a series of texts on the second</p> <p>12 page. First page I believe is just a cover</p> <p>13 page. There's a series of texts on page 2. Do</p> <p>14 you see those?</p> <p>15 A Yes.</p> <p>16 Q Do you recognize these as texts between you and</p> <p>17 your brother Reed?</p> <p>18 A Yes.</p> <p>19 Q That's his -- he's indicated as owner, that's</p> <p>20 his phone number, right, 608-217-5910?</p> <p>21 A Last I knew that was his phone number.</p> <p>22 Q Okay. And you did, in fact, text your brother</p> <p>23 on the 5th of May 2020 at 4:14 p.m. and write,</p> <p>24 "Steve is taking me to court. He wants me to</p> <p>25 pay him maintenance. His reasons are all</p>	<p>1 ask after this May 5, 2020, text exchange with</p> <p>2 your brother about whether or not there was</p> <p>3 money that could be provided to you through</p> <p>4 Milmont?</p> <p>5 A Did not.</p> <p>6 Q Why not?</p> <p>7 A I didn't know what he meant by take care of</p> <p>8 through Milmont. So I didn't have questions to</p> <p>9 ask because I didn't know.</p> <p>10 Q You knew at the time that Milmont included the</p> <p>11 cottages, correct?</p> <p>12 A Yes.</p> <p>13 Q So is it your testimony that you didn't</p> <p>14 understand that taking care of it in Milmont</p> <p>15 referred to something to do with the cottages?</p> <p>16 MS. POLAKOWSKI: Objection.</p> <p>17 Mischaracterizes her testimony.</p> <p>18 THE WITNESS: I figured that it</p> <p>19 probably had something to do with the cottages.</p> <p>20 BY MR. CHURCHILL:</p> <p>21 Q Do you have a sentimental attachment to the</p> <p>22 cottages?</p> <p>23 MS. POLAKOWSKI: Objection. Form.</p> <p>24 Vague.</p> <p>25 THE WITNESS: I used to have a huge</p>
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<p>1 bullshit. I'm going to need to get some money."</p> <p>2 A Yes.</p> <p>3 Q And your brother Reed wrote back at 5:25 p.m.,</p> <p>4 "We have a Covod problem." He accidently</p> <p>5 misspelled COVID, right? "Your timing couldn't</p> <p>6 be worse. We might have to take care of it in</p> <p>7 Milmont." Do you see that?</p> <p>8 A Yes.</p> <p>9 Q Why did you reach out to your brother?</p> <p>10 A I always reached out to my brother when I wanted</p> <p>11 to cash in some of my stock.</p> <p>12 Q And your brother had always agreed, right?</p> <p>13 A No. He told me to talk to Kiesler.</p> <p>14 Q Ultimately, you had redeemed the stock when you</p> <p>15 had requested it, though, correct?</p> <p>16 A Yes.</p> <p>17 Q What did you understand at the time him to mean</p> <p>18 by his reference to might have to take care of</p> <p>19 it in Milmont?</p> <p>20 A I didn't ask. I don't know. It never came up</p> <p>21 again.</p> <p>22 Q But what did it mean to you at the time,</p> <p>23 anything?</p> <p>24 A No.</p> <p>25 Q You said it never came up again. Did you ever</p>	<p>1 sentimental value, but I don't have that anymore.</p> <p>2 BY MR. CHURCHILL:</p> <p>3 Q At the time of this redemption, which would have</p> <p>4 been -- well, actually we're not at the</p> <p>5 redemption yet. So May of 2020. So more than</p> <p>6 three years ago did you have that sentimental</p> <p>7 attachment to Milmont?</p> <p>8 A Yes.</p> <p>9 Q Would you have been interested in that time</p> <p>10 frame, May of 2020, in selling off part of your</p> <p>11 interest in the cottages?</p> <p>12 MS. POLAKOWSKI: Objection. Calls for</p> <p>13 speculation.</p> <p>14 THE WITNESS: I never thought about</p> <p>15 it.</p> <p>16 BY MR. CHURCHILL:</p> <p>17 Q But you would have been interested?</p> <p>18 MS. POLAKOWSKI: Same objection.</p> <p>19 THE WITNESS: I don't know what I</p> <p>20 would have thought at that time.</p> <p>21 BY MR. CHURCHILL:</p> <p>22 Q Isn't it true that when the topic of Milmont</p> <p>23 came up later after the redemption and closer to</p> <p>24 the time of you filing suit that you made it</p> <p>25 clear that you didn't want to part with your</p>

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<p>1 interest in Milmont?</p> <p>2 MS. POLAKOWSKI: Objection.</p> <p>3 Foundation. Assumes facts not in evidence.</p> <p>4 THE WITNESS: Milmont had nothing to</p> <p>5 do with this suit.</p> <p>6 BY MR. CHURCHILL:</p> <p>7 Q Did you try to explore other ways to obtain</p> <p>8 money other than a sale of your stock from Windy</p> <p>9 Waters?</p> <p>10 A No.</p> <p>11 Q Did you apply for any loans?</p> <p>12 MS. POLAKOWSKI: Objection. Vague as</p> <p>13 to timing.</p> <p>14 BY MR. CHURCHILL:</p> <p>15 Q We're still talking in this May 2020 time frame</p> <p>16 prior to your May 18 hearing in your divorce</p> <p>17 case.</p> <p>18 A No.</p> <p>19 Q In that same time frame prior to your May 18</p> <p>20 hearing while your divorce proceeding was going</p> <p>21 on, did you ask other family members for money?</p> <p>22 A No.</p> <p>23 Q In that same time frame did you take money out</p> <p>24 of retirement accounts?</p> <p>25 A No.</p>	<p>1 Q How many?</p> <p>2 A I believe there was eight.</p> <p>3 Q And do you know their approximate value at the</p> <p>4 time?</p> <p>5 A I did not.</p> <p>6 Q Did you consider selling any of the eight condos</p> <p>7 that you owned?</p> <p>8 A No.</p> <p>9 Q Why not?</p> <p>10 A That was part of our income at the time.</p> <p>11 Q When you say "our income," you mean --</p> <p>12 A Steve and I.</p> <p>13 Q -- you and Steven? And how did you get that</p> <p>14 income, you rented them out?</p> <p>15 A Yes.</p> <p>16 Q And did you obtain lease -- excuse me, did you</p> <p>17 obtain rental income on all eight?</p> <p>18 A Yes.</p> <p>19 Q Where is Cottage Grove?</p> <p>20 A It's between --</p> <p>21 Q Sorry. I don't know.</p> <p>22 A I think it's south of Madison, but I don't know.</p> <p>23 Q How long had you had those condos?</p> <p>24 A I really don't know.</p> <p>25 Q Do you still own those condos today?</p>
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<p>1 Q Did you consider moving?</p> <p>2 A In May of 2020?</p> <p>3 Q Yes.</p> <p>4 A I had already moved, so, no.</p> <p>5 Q Where were you living at the time?</p> <p>6 A I was living in an apartment that I'm still in</p> <p>7 in McFarland.</p> <p>8 Q Did you have an obligation in May of 2020 for</p> <p>9 condo payments?</p> <p>10 MS. POLAKOWSKI: Objection. Calls for</p> <p>11 a legal conclusion.</p> <p>12 THE WITNESS: I didn't think so.</p> <p>13 BY MR. CHURCHILL:</p> <p>14 Q But did you? You said you didn't think so. Did</p> <p>15 you have an obligation for condo payments in May</p> <p>16 of 2020?</p> <p>17 MS. POLAKOWSKI: Objection. Calls for</p> <p>18 a legal conclusion. Asked and answered.</p> <p>19 THE WITNESS: I don't know.</p> <p>20 BY MR. CHURCHILL:</p> <p>21 Q Did you have any rental properties at the time</p> <p>22 in May of 2020 prior to May 18?</p> <p>23 A Yes.</p> <p>24 Q What were those rental properties?</p> <p>25 A They were condominiums in Cottage Grove.</p>	<p>1 A I do not.</p> <p>2 Q Were those -- any of those eight condo</p> <p>3 properties that you and Steven purchased with</p> <p>4 some of the money you got from the prior stock</p> <p>5 redemptions?</p> <p>6 A No.</p> <p>7 Q You mentioned earlier in your testimony that</p> <p>8 there were properties that Steven had purchased.</p> <p>9 Do you remember that?</p> <p>10 A Yes.</p> <p>11 Q What properties were you discussing then?</p> <p>12 A The properties in Florida.</p> <p>13 Q And did you still have those properties in May</p> <p>14 of 2020?</p> <p>15 A No.</p> <p>16 MS. POLAKOWSKI: Objection to form.</p> <p>17 Mischaracterizes her testimony.</p> <p>18 BY MR. CHURCHILL:</p> <p>19 Q What were those properties exactly?</p> <p>20 A I didn't have much interest in that. I believe</p> <p>21 most of them were homes.</p> <p>22 Q When you say you didn't have much interest, do</p> <p>23 you mean like personal intellectual interest or</p> <p>24 financial interest?</p> <p>25 A Intellectual.</p>